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**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF NEW JERSEY**

IN RE DUCTILE IRON PIPE  
FITTINGS (“DIPF”) DIRECT  
PURCHASER ANTITRUST  
LITIGATION

Civ. No. 12-711 (AET)(LHG)

**NOTICE OF MOTION IN SUPPORT OF DIRECT  
PURCHASER PLAINTIFFS’ MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT WITH  
DEFENDANT SIGMA CORPORATION AND ITS OWNED  
SUBSIDIARY SIGMA PIPING PRODUCTS CORPORATION**

TO: COUNSEL OF RECORD

PLEASE TAKE NOTICE that on June 15, 2015, at 10:00 a.m. or as soon thereafter as counsel may be heard, the undersigned attorneys for the Direct Purchaser Plaintiffs in the above-captioned action shall move before the Hon. Anne E. Thompson, U.S.D.J., Clarkson S. Fisher Building, & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for the entry of a Preliminary Approval Order:

1. Preliminarily approving the Settlement Agreement between Direct Purchaser Plaintiffs and SIGMA Corporation and its owned subsidiary SIGMA Piping Products Corporation and finding that its terms are sufficiently fair, reasonable, and adequate for notice to be issued to the Settlement Classes as defined in the Settlement Agreement;
2. Certifying the Settlement Classes, for purposes of settlement only pursuant to Federal Rule of Civil Procedure 23(c), and authorizing plaintiffs to represent the Settlement Classes; and
3. Approving Garden City Group, LLC as Administrator of the Settlement, and Citibank, N.A. as escrow agent.

In support of this motion, Direct Purchaser Plaintiffs rely upon the Memorandum of Law in Support of Direct Purchaser Plaintiffs' Motion for Preliminary Approval of Settlement with SIGMA Corporation and its owned subsidiary SIGMA Piping Products Corporation, as well as the accompanying Declaration of Robert N. Kaplan.

Direct Purchaser Plaintiffs submit a proposed form of Order.

DATED: May 21, 2015

/s/ Mayra V. Tarantino

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